

Exhibit A16

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EXHIBIT 24

Sent: Thur 5/19/2022 6:19:45 PM (UTC)
From: divento@google.com
To: caitlinburke@google.com, divento@google.com
Subject: 1MogaQAAAAE-MBI-FLAT:2022-05-18T23:19:44.369663

Case 3:21-cv-05227-JD Document 462-10 Filed 09/28/23 Page 3 of 65

divento@google.com 2022-05-19T18:19:44.369Z

So it sounds like Match filed a restraining order against us - they are putting \$40M in escrow to effectively try and block us from enforcing our policy. So they wouldn't be non compliant potentially and we'd still go to court. Once the docs become public we should discuss treatment with TA if we end up getting that \$

caitlinburke@google.com 2022-05-19T18:20:08.703Z

oh my gosh

caitlinburke@google.com 2022-05-19T18:20:38.515Z

also in terms of prior documentation on Match deals?

divento@google.com 2022-05-19T18:20:58.601Z

I don't understand the question , sorry

divento@google.com 2022-05-19T18:21:07.582Z

What about prior documentation? I.e. do we need to revise?

caitlinburke@google.com 2022-05-19T18:21:42.932Z

yes I just meant I know with some specific deals we need to be very careful about what is written in terms of notes

caitlinburke@google.com 2022-05-19T18:21:54.396Z

since I'm sure we have notes on prior Match deals

caitlinburke@google.com 2022-05-19T18:21:59.997Z

or at least I do

caitlinburke@google.com 2022-05-19T18:22:24.732Z

should I revise them? or just be careful about what i have?

caitlinburke@google.com 2022-05-19T18:22:36.746Z

or maybe it doesn't matter

divento@google.com 2022-05-19T18:22:45.085Z

I would avoid anything written where possible

divento@google.com 2022-05-19T18:22:50.663Z

Assume everything will become public

caitlinburke@google.com 2022-05-19T18:22:53.998Z

got it

caitlinburke@google.com 2022-05-19T18:22:54.871Z

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GOOG-PLAY5-000088223

thanks

divento@google.com 2022-05-19T18:23:06.939Z

So no notes/emails/decks and make sure Legal is copied on everything

caitlinburke@google.com 2022-05-19T18:23:24.749Z

okay thank you

divento@google.com 2022-05-19T18:34:18.431Z

Have you reviewed that xPA GLink Charter btw?

divento@google.com 2022-05-19T18:34:56.826Z

https://docs.google.com/presentation/d/1zuQaVO83oLkUqRvRbrifLu323NzpJgKzf9arWR7ZBYo/edit?resourcekey=0-y_LQVN5csXrnOvqwbeJPOQ#slide=id.g10963970153_3_12

https://docs.google.com/presentation/d/1zuQaVO83oLkUqRvRbrifLu323NzpJgKzf9arWR7ZBYo/edit?resourcekey=0-y_LQVN5csXrnOvqwbeJPOQ#slide=id.g10963970153_3_12

<https://drive.google.com/open?id=1zuQaVO83oLkUqRvRbrifLu323NzpJgKzf9arWR7ZBYo>

caitlinburke@google.com 2022-05-19T18:48:13.966Z

yes looks interesting

divento@google.com 2022-05-19T20:46:59.413Z

Are you looped in on the B* incentives? I mainly want to make sure they aren't doing anything funky from an ops perspective

caitlinburke@google.com 2022-05-19T22:08:27.075Z

Hi. Yes I had to miss the meeting yesterday and today but I talked to Brian B separately and went through the deck. The only different/funky thing at this point is discussion of [REDACTED]
[REDACTED] Brian is floating this for discussion in the meeting today and will have a separate meeting with us on how we would operationalize it if the team likes this proposed incentive structure.

divento@google.com 2022-05-19T23:18:06.474Z

Oh yes that's right - ok thank you! Let me know if you or Olivia have any concerns or if we need to consider any FF/TTL if it's a new flow

Exhibit A17

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EXHIBIT 25

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Page 252

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-----x
IN RE GOOGLE PLAY STORE Case No.
ANTITRUST LITIGATION 3:21-md-02981-JD

THIS DOCUMENT RELATES TO:
Epic Games Inc. v. Google LLC, et al.,
Case No: 3:20-cv-05671-JD

In re Google Play Consumer
Antitrust Litigation,
Case No: 3:20-cv-05761-JD

In re Google Play Developer
Antitrust Litigation,
Case No: 3:20-cv-05792-JD

State of Utah, et al.,
v. Google LLC, et al.,
Case No: 3:21-cv-05227-JD

-----x
HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF
CHRISTOPHER LI
Wednesday, May 25, 2022
Volume 2

Reported By: Lynne Ledanois, CSR 6811

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Page 11

1 Kumagai.

2 MS. WOODIN: Good morning. Christine
3 Woodin from Hueston Hennigan on behalf of the Match
4 Group entities.

5 MR. DICKLER: Michael Dickler, Sperling &
6 Slater, on behalf of the Developer plaintiffs.

7 MR. MILLER: Good morning. Adam Miller,
8 Deputy Attorney General, State of California for the
9 State plaintiffs. With me on realtime on the video
10 is Michael Altebrando from Utah and also realtime is
11 Brendan Benedict also from Utah.

12 MS. CURRAN-HUBERTY: Good morning. This
13 is Emily Curran-Huberty of Munger Tolles & Olson on
14 behalf of the witness and Google. With me is Kevin
15 Benedicto of Morgan Lewis & Bockius. Also with me
16 is Alex Zbrozek from Google.

17 THE VIDEOGRAPHER: Is that everybody
18 present for today? Thank you.

19 CHRISTOPHER LI,
20 having been duly sworn, testified as follows:

21 EXAMINATION

22 BY MR. BYARS:

23 Q Good morning, Mr. Li.

24 A Good morning.

25 Q Like I said, my name is John Byars. I'm

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Page 359

1 MS. CURRAN-HUBERTY: Object to form.

2 THE WITNESS: Yes, it was presented.

3 BY MR. OTTAUNICK:

4 Q And the Business Council authorized you to
5 ask Samsung whether Google Play could be the only
6 app store on the home screen of Samsung's devices;
7 correct?

8 A Yes.

9 Q And Google attempted to make the Galaxy
10 store move off of the home screen and on to a
11 different screen; correct -- withdrawn.

12 Google proposed to Samsung that the Galaxy
13 store should be moved off of the home screen of
14 Samsung's devices and on to a different screen;
15 correct?

16 A We got Samsung's thoughts on that proposal.

17 Q You made that proposal to Samsung;
18 correct?

19 A We got Samsung's thoughts on that idea. In
20 the end we chose not to pursue that path.

21 Q You got Samsung's thoughts on that idea
22 because you made a proposal to Samsung that Google
23 Play would be the only app store on the home screen
24 of Samsung's devices; correct?

25 MS. CURRAN-HUBERTY: Object to form.

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Page 360

1 THE WITNESS: Yes, one of several
2 conditions was discussed with Samsung.

3 BY MR. OTTAUNICK:

4 Q In exchange for default home screen
5 exclusivity for Google Play and the other benefits
6 described on this slide, Google was prepared to pay
7 Samsung [REDACTED] over four years; correct?

8 A I can't verify the number there. That's a
9 projection. I don't know how it came together.

10 Q That's the projection you made to the
11 Business Council, isn't it?

12 MS. CURRAN-HUBERTY: Object to form.

13 THE WITNESS: At that point in time, yes,
14 that was the projection with the different
15 components.

16 BY MR. OTTAUNICK:

17 Q So the Business Council authorized the
18 deal to you to pay Samsung up to [REDACTED] for
19 benefits that would include moving the Galaxy store
20 off the default home screen?

21 A This was the initial proposal to Business
22 Council to get approval to have the initial
23 conversation with Samsung. [REDACTED]

[REDACTED]

[REDACTED]

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Page 366

1 A Yes.

2 Q According to gray bar in the middle chart,
3 Google projected [REDACTED] in service revenue
4 during the four-year term of this deal.

5 Do you see that?

6 A That's what this chart says, yes.

7 Q And according to the speaker notes, I'm
8 looking at the second line, [REDACTED]
9 [REDACTED]

10 Do you see that?

11 A Yes.

12 Q So the projection on this slide was that
13 over the four-year term of this deal, Samsung's
14 devices could generate [REDACTED]
15 [REDACTED]

16 A I didn't write the speaker notes, so that
17 could be an interpretation, but I don't know
18 specifically what they meant to say.

19 Q Now, looking back up at the bar chart, [REDACTED]
20 is the gray number, but there are also three smaller
21 segments right above that.

22 Do you see those?

23 A Yes.

24 Q According to the red comment bubble next
25 to the item that says 1 billion, the number there is

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Page 367

1 "At risk to Play via Samsung app store."

2 Do you see that?

3 A Yes.

4 Q Does that mean there was \$1 billion at
5 risk to the Google Play Store from Samsung's app
6 store?

7 MS. CURRAN-HUBERTY: Object to form.

8 THE WITNESS: I don't know what that label
9 means.

10 BY MR. OTTAUNICK:

11 Q Do you see the dark green bar in the
12 middle chart that says [REDACTED]

13 A You mean the [REDACTED]

14 Q Yes.

15 A Yes.

16 Q That bar says, [REDACTED]

17 Do you know what that term means?

18 A No, I don't.

19 Q And then do you see the light green bar at
20 the top that says [REDACTED]

[REDACTED]

22 A I see the label, yes.

23 Q Is your understanding that the projection
24 here is that [REDACTED]

[REDACTED] under this

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Page 377

1 Q And why did the deal team of which you
2 were a part decide not to pursue that clause?

3 A We decided to not pursue the clause because
4 after having conversations with Samsung, hearing their
5 perspective and their viewpoint, we mutually decided
6 that we did not want to pursue that path.

7 Q What perspective did Samsung provide you
8 that led you to that conclusion?

9 A I don't recall the exact specifics of how I
10 reached that decision.

11 Q Do you recall anything that Samsung told
12 you about Google's request that the Google Play
13 Store have default home screen exclusivity on
14 Samsung's devices?

15 A I don't recall the details behind how we
16 reached that decision.

17 Q Do you recall anything that Samsung told
18 you that informed the decision you ultimately made?

19 A I recall some things that were mentioned. I
20 don't recall the details of them.

21 Q Recognizing you don't recall the details,
22 can you tell me the things you recall that were
23 mentioned?

24 A No.

25 Q You're not willing to tell me what you

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Page 378

1 just testified on the record are several details you
2 recall Samsung provided you?

3 A No, what I just mentioned to you was I
4 recall the general theme that we decided, hey, we
5 don't want to pursue this path; but I don't remember
6 the details of how we reached that decision.

7 Q I'll read back your testimony, Mr. Li.

8 You testified: I recall some things that
9 were mentioned, but I don't recall the details of
10 that.

11 What things do you recall that were
12 mentioned?

13 A Yes, so what I mean by "some things," I
14 remember the general theme that we don't want to
15 pursue this path. That's what I mean by "things."

16 Q So Samsung did not want to make Google
17 Play the exclusive app store on the home screen of
18 Samsung's devices. That's what Samsung told Google?

19 A No.

20 MS. CURRAN-HUBERTY: Object to form.

21 THE WITNESS: We discussed of all the
22 five, six services that we're discussing, among many
23 other things, this is not something that we felt
24 like was worth pursuing a deeper collaboration on.

25

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Page 388

1 document, during the term of the three RSAs that are
2 being discussed, Google proposed to pay Samsung
3 between ■ and ■■■■■; correct?

4 MS. CURRAN-HUBERTY: Object to form.

5 THE WITNESS: Yes, that is a projection of
6 what this specific team that did the modeling
7 thought that the deal might be paying out.

8 BY MR. OTTAUNICK:

9 Q So the team projected that the three
10 revenue share agreements with Samsung would pay out
11 between ■ and ■■■■■ over the ■■■■■ of
12 those agreements?

13 MS. CURRAN-HUBERTY: Object to form.

14 THE WITNESS: Yes, that appears to be what
15 the deal -- the team projected out.

16 BY MR. OTTAUNICK:

17 Q If Samsung terminated it's
18 anti-fragmentation agreement with Google, Samsung
19 would lose access to the projected ■ to ■■■■■
20 in revenue share under these RSAs; correct?

21 MS. CURRAN-HUBERTY: Object to form.

22 THE WITNESS: If Samsung terminated the --
23 I don't know. I would need to check all the
24 different agreements and the implications of that.

25

Exhibit A18

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EXHIBIT 26

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4 Case No. 3:21-md-02981-JD
5 -----x

6 IN RE GOOGLE PLAY STORE
7 ANTITRUST LITIGATION

8 THIS DOCUMENT RELATES TO:
9 Epic Games Inc. v. Google LLC, et al.,
10 Case No: 3:20-cv-05671-JD

11 In re Google Play Consumer
12 Antitrust Litigation,
13 Case No: 3:20-cv-05761-JD

14 In re Google Play Developer
15 Antitrust Litigation,
16 Case No: 3:20-cv-05792-JD

17 State of Utah, et al., v.
18 Google LLC, et al.,
19 Case No: 3:21-cv-05227-JD

20 Match Group, LLC, et al.,
21 v. Google LLC, et al.,
22 Case No. 3:22-cv-02746-JD

23 -----x
24 Tuesday, August 23, 2022
25 9:16 a.m. PDT

26 **HIGHLY CONFIDENTIAL
27 UNDER PROTECTIVE ORDER**
28 - Volume I -

29 Remote Videotaped Deposition by
30 Virtual Zoom of DONALD HARRISON, a
31 Witness on behalf of Google, taken before
32 Dawn Matera, a Certified Shorthand
33 Reporter and Notary Public of the State
34 of New York.
35

1 DONALD HARRISON - HIGHLY CONFIDENTIAL

2 and I am the videographer. The court
3 reporter is Dawn Matera from the firm
4 of Veritext Legal Solutions.

5 I am not authorized to
6 administer an oath. I am not related
7 to any party in this action nor am I
8 financially interested in the outcome.

9 Please note that all appearances
10 and affiliations will be noted on the
11 stenographic record and will the court
12 reporter please swear in the witness
13 remotely.

14 D O N A L D H A R R I S O N, the
15 Witness herein, having first been duly
16 sworn by the Notary Public, was examined
17 and testified as follows:

18 EXAMINATION BY

19 MR. SCHWARTZ:

20 Q. Good morning, Mr. Harrison. My
21 name is Aaron Schwartz and I will be
22 asking you questions today on behalf of
23 the consumer class.

24 Can you please state your full
25 name for the record, please.

1 DONALD HARRISON - HIGHLY CONFIDENTIAL

2 A. Donald Stuart Harrison.

3 Q. Could you please also state
4 your home address for the record?

5 A. It's [REDACTED]
[REDACTED]

7 Q. Thank you. Do you foresee any
8 changes to your address in the coming
9 months between now and trial which is
10 supposed to be somewhere around May or
11 June of 2023?

12 A. I do not. We did move a year
13 and a half ago, so you will occasionally
14 see old addresses associated with my
15 name, but we don't expect to be moving.

16 Q. Got it. Got it. So you'll be
17 in this address that you just gave, you
18 expect to be at least until May or June
19 of 2023, if not beyond?

20 A. I do.

21 Q. Great. So just a few ground
22 rules that I am sure you're familiar
23 with. I am going to be asking you a
24 series of questions today. If at any
25 point you don't understand a part or all

1 DONALD HARRISON - HIGHLY CONFIDENTIAL

2 Cloud or other revenue, but in that
3 ballpark.

4 Q. Okay. You can close this
5 document.

6 Are you aware that in 2016
7 Google and Apple extended the ISA?

8 A. I am aware of that.

9 Q. And are you aware that as part
10 of that, [REDACTED]

[REDACTED]

12 A. I am aware of that. Again, the
13 rev share has [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 Q. And so if Google paid [REDACTED]
[REDACTED] to Apple in 2021, it's fair to

22 say that Google revenue from search
23 coming from Apple was somewhere between
24 [REDACTED] dollars in 2021?

25 A. Yeah, that sounds roughly

1 DONALD HARRISON - HIGHLY CONFIDENTIAL

2 right.

3 Q. Okay. If you open PX 1492.

4 (PX Exhibit 1492, Document Bates
5 stamped GOOG-PLAY2-000455423, was so
6 marked for identification, as of this
7 date.)

8 Q. Does that seem like a true and
9 correct copy of the amendment to ISA of
10 2016 executed in late September 2016?

11 A. Yes, it looks like a correct
12 copy.

13 Q. Now, if Google agreed to [REDACTED]
14 [REDACTED] in 2016, that means
15 that Google found it financially
16 beneficial to pay Apple [REDACTED] percent of its
17 revenue on all search traffic coming from
18 Apple in exchange for being the default
19 search engine on Apple devices, correct?

20 A. I am sorry, you said
21 economically beneficial? I am sorry,
22 just repeat the first, what it was that
23 we determined?

24 Q. That it was financially
25 beneficial to pay Apple [REDACTED] percent of

Exhibit A19

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EXHIBIT 27

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Page 1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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IN RE GOOGLE PLAY STORE Case No.
ANTITRUST LITIGATION 3:21-md-02981-JD

THIS DOCUMENT RELATES TO: MDL No. 2891

Epic Games Inc. v. Google LLC,
et al.,
Case No. 3:20-cv-05671-JD

In re Google Play Consumer
Antitrust Litigation,
Case No. 3:20-cv-05761-JD

In re Google Play Developer
Antitrust Litigation,
Case No. 3:20-cv-05792-JD

State of Utah, et al.,
v. Google LLC, et al.,
Case No. 3:21-cv-05227-JD

Match Group LLC, et al.,
v. Google LLC, et al.,
Case No. 3:22-cv-02746-JD

-----x
HIGHLY CONFIDENTIAL - UNDER PROTECTIVE ORDER

REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF
PURNIMA KOCHIKAR
Wednesday, August 31, 2022

Reported By: Lynne Ledanois, CSR 6811

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Page 14

1 PURNIMA KOCHIKAR,
2 having been duly sworn, testified as follows:

3
4 EXAMINATION

5 BY MS. MOSKOWITZ:

6 Q Good morning, Ms. Kochikar. My name is
7 Lauren Moskowitz, as you heard. I represent Epic
8 Games and I'll be starting your deposition today.

9 If you could just please state your full
10 name for the record.

11 A Purnima Kochikar.

12 Q And can you provide your address, please?

13 A [REDACTED]
[REDACTED]

15 Q Thank you. Today we'll be -- I'll be
16 asking you questions, you will be providing answers.
17 I'm going to do my best to avoid speaking over you.
18 I may do it if I can't tell you were done.

19 But I would ask that you try to also wait
20 for me to finish my question before you start your
21 answer.

22 Is that okay?

23 A Yes.

24 Q And please, if at any point you don't
25 understand one of my questions, please ask me for

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Page 22

1 A Yes.

2 Q Did you take any steps to change any
3 settings for your instant message software?

4 A No.

5 Q Did you have your default setting to
6 delete chats every 24 hours?

7 MS. NARANJO: Object to form. You can
8 answer.

9 THE WITNESS: Yes.

10 BY MS. MOSKOWITZ:

11 Q Have you discussed this lawsuit with
12 anyone other than Google's lawyers?

13 A No.

14 Q Have any developers ever asked you any
15 questions about this lawsuit?

16 A No.

17 Q Never?

18 A No.

19 Q Are you aware of any investigations
20 underway about the Google Play Store in any way?

21 A Yes.

22 Q And what investigations are you aware of?

23 A The more recent conversations with the DMA,
24 for example.

25 Q I'm sorry, I didn't catch the acronym.

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Page 104

1 earlier that had a list of projects including
2 Project Hug, games velocity, et cetera?

3 A Yes.

4 Q And I didn't ask you then, but can you
5 tell me now what did you to prepare to testify on
6 this topic specifically with respect to the velocity
7 programs and Project Hug?

8 A It's my day-to-day work.

9 Q So you had personal knowledge of this and
10 didn't need to do anything else to study up on it?

11 A No.

12 Q Games Velocity Program is also known as
13 Project Hug and vice versa?

14 A Yes.

15 Q And Project Hug has also been referred to
16 as Project Bear Hug?

17 A Maybe for a tiny moment.

18 Q That was in the beginning?

19 A Yes. Project names are an odd thing of how
20 people come up with things.

21 Q Whose idea was the Hug name for this
22 project?

23 A I don't remember. I'm sure it's some
24 strategy team.

25 Q The overall project, though, regardless of

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Page 170

1 Feature parity we haven't really talked
2 about. What that's trying to communicate is that
3 the version of the app that was would be downloaded
4 through Play would be the same as the version
5 offered off of Play?

6 A Yes.

7 Q And again, that mitigated the risk that
8 the developer would have an incentive to distribute
9 outside of Play?

10 A We were hoping that it would mean they would
11 choose Play, but yes.

12 Q All right. Those same gets of sim-ship
13 and feature parity were present for the 2021 program
14 as well?

15 A Yes.

16 Q So they -- similarly, the mitigation of
17 risk of distribution off of Play is still present
18 for the 2021, among other things; right?

19 A I think right now it's much more about, as I
20 said, the cross Google strategic partnerships. The
21 sim-ship and feature parity components continue to be
22 the same, we prioritize Play users.

23 Q So even if it's not the primary goal,
24 mitigation of risk of off Play distribution remains
25 part of the program for 2021?

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Page 178

1 game on Android; right?

2 A Yes.

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22 Q Was that --

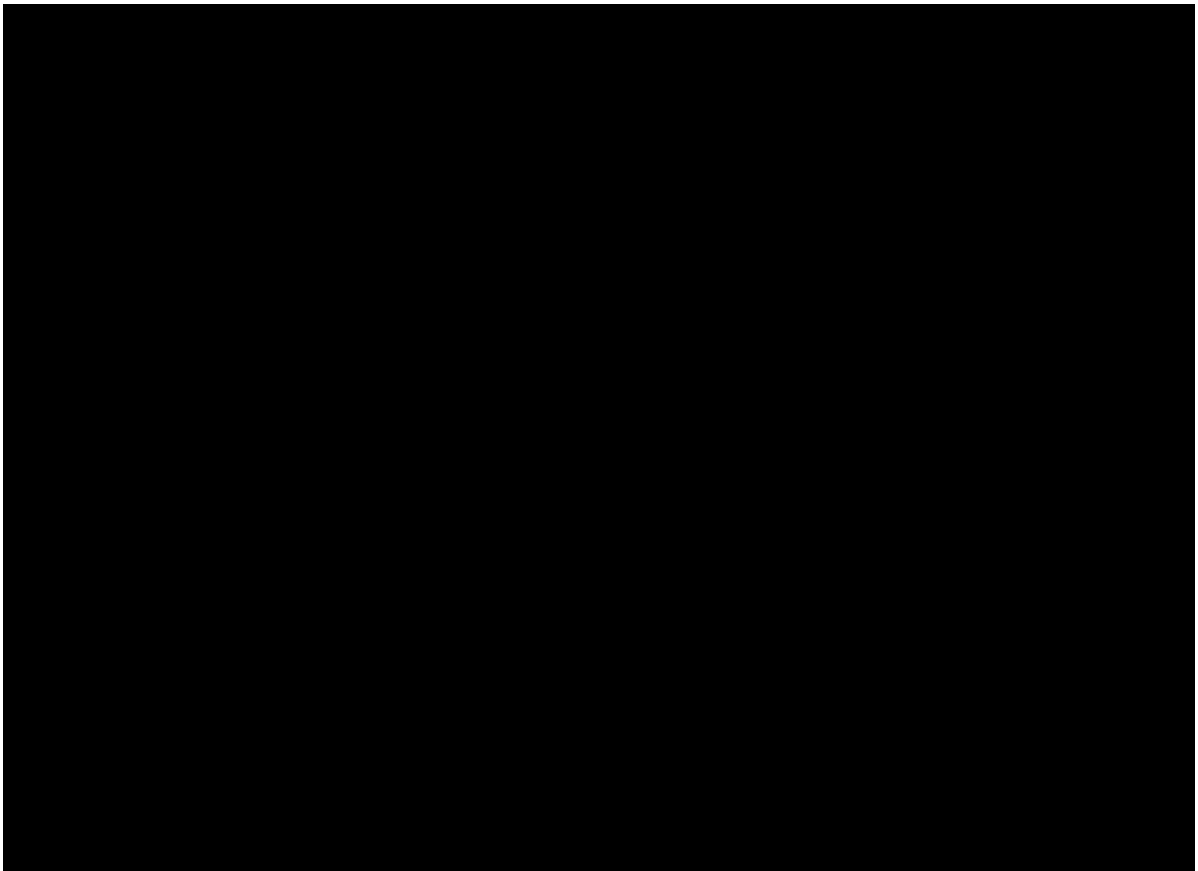
23 A Sorry, I'm losing my voice. Yes.

24 Q No problem. If you ever need to grab
25 water, please do. I will do that right now.

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Page 179

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Q And that was the first time that [REDACTED] would be offered as part of any Hug or Hug adjacent deal; correct?

A This wasn't in the contours of Hug at all. Emerging markets is critical for Android both from a mission perspective about bringing computing to the world as well as the dependence. More people trust Android and want Android to -- is Android the link to the internet for livelihood, et cetera.

Emerging markets are slow to monetize and so some of the large developers have to make a leap of faith to get to emerging markets.

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Page 263

1 A Yes.

2 Q When a user elects to use Google Play
3 Billing, Spotify will pay a 4 percent fee upfront to
4 Google that will be adjusted; right?

5 A Yes.

6 Q And the 4 percent was selected as a proxy
7 or a projection of what Google's actual payment
8 processing fees would be for the payments processed
9 through Google Play Billing; right?

10 A I think that's -- you can't take it in
11 isolation. This particular deal was going to help us
12 foundationally set the course for the next decade,
13 not --

14 Q Sorry, I don't want to interrupt you. I
15 want to understand.

16 I'm just asking about the 4 percent, that
17 was an estimate of what Google's actual payment
18 processing fees were going to be in processing those
19 payments?

20 A That was an estimate based on what we
21 thought was a -- what do you call it, the FOP mix as
22 we say. It's unclear.

23 Q It was going to be adjusted; right? Every
24 year there was going to be an analysis done about
25 the actual out-of-pocket cost Google paid for the

Exhibit A20

Public Redacted Version

EXHIBIT 28

johanh@google.com 2022-12-19T19:58:28.161Z

<https://www.gamesindustry.biz/activision-blizzard-president-and-coo-daniel-alegre-stepping-down>

<https://www.gamesindustry.biz/activision-blizzard-president-and-coo-daniel-alegre-stepping-down>

johanh@google.com 2022-12-19T19:59:09.541Z

(ex-Googler) ABK COO, Daniel Alegre, steps down without announced replacement

kgkaran@google.com 2022-12-19T20:05:40.977Z

He's been planning this for a while since the MS announcement

kgkaran@google.com 2022-12-19T20:06:03.911Z

A close friend was interviewing into his direct team at ABK and he told the guy to hold on a few weeks until he moves

johanh@google.com 2022-12-19T20:06:33.621Z

ah interesting

putze@google.com 2022-12-19T22:16:20.462Z

https://docs.google.com/document/d/1kymvtNEdu2TMAafgoHfIRnS1iRF7JRta_FOS7BZmI2E/edit?resourcekey=0-_pRlkt6N3-5fOrTL6IkkRw

https://drive.google.com/open?id=1kymvtNEdu2TMAafgoHfIRnS1iRF7JRta_FOS7BZmI2E

https://docs.google.com/document/d/1kymvtNEdu2TMAafgoHfIRnS1iRF7JRta_FOS7BZmI2E/edit?resourcekey=0-_pRlkt6N3-5fOrTL6IkkRw

putze@google.com 2022-12-19T22:16:38.693Z

Hi guys-- wrote up some prep stuff for call tomorrow with King CEO and greg

putze@google.com 2022-12-19T22:45:27.759Z

Johan i added everything we discussed

kgkaran@google.com 2022-12-19T22:45:45.280Z

the Sameer email at the end is spot on

putze@google.com 2022-12-19T22:45:46.324Z

Karan -- PTAL at 2 things

putze@google.com 2022-12-19T22:45:53.635Z

ok great

putze@google.com 2022-12-19T22:45:57.114Z

that was 1 of the 2 things

putze@google.com 2022-12-19T22:45:59.580Z



kgkaran@google.com 2022-12-19T22:47:29.266Z

2nd being? 😊

putze@google.com 2022-12-19T22:50:58.677Z

what we do in a no-go B* scenario

putze@google.com 2022-12-19T22:51:03.546Z

johan and i spoke about this earlier

putze@google.com 2022-12-19T22:51:12.399Z

how do we resolve the makegood

putze@google.com 2022-12-19T22:51:30.639Z

best we could come up with is-- [REDACTED]

kgkaran@google.com 2022-12-19T22:56:51.246Z

I am drawing a blank honestly beyond what you said

kgkaran@google.com 2022-12-19T22:57:15.925Z

UCB = user choice billing?

putze@google.com 2022-12-19T22:57:51.988Z

yeah

putze@google.com 2022-12-19T22:58:04.131Z

oh wait

putze@google.com 2022-12-19T22:58:07.347Z

brain fart

putze@google.com 2022-12-19T22:58:09.541Z

GPB

putze@google.com 2022-12-19T22:58:11.009Z



putze@google.com 2022-12-19T22:58:11.863Z

jesus

kgkaran@google.com 2022-12-19T22:58:18.329Z

we cannot tell them that anyways... so I'd not focus on that part?

putze@google.com 2022-12-19T22:58:18.642Z

kgkaran@google.com 2022-12-19T22:58:38.472Z



putze@google.com 2022-12-19T22:58:39.987Z

no i mean, trying to think how we can track promos to android users

putze@google.com 2022-12-19T22:58:46.094Z

we can track spend through GPB

putze@google.com 2022-12-19T22:58:56.436Z

they can tell us promo periods

putze@google.com 2022-12-19T22:59:03.743Z

we can track spend vs "list price"

putze@google.com 2022-12-19T22:59:11.030Z

until they draw it down

kgkaran@google.com 2022-12-19T22:59:26.944Z

do we think they can do [REDACTED] even if they offer [REDACTED]
[REDACTED]

putze@google.com 2022-12-19T22:59:29.199Z

(seems like overhead but im sure some sort of query can puoll it)

putze@google.com 2022-12-19T22:59:33.220Z

haha

putze@google.com 2022-12-19T22:59:37.779Z

[REDACTED]

putze@google.com 2022-12-19T22:59:49.987Z

[REDACTED]

putze@google.com 2022-12-19T22:59:53.320Z

they can do [REDACTED] a year

kgkaran@google.com 2022-12-19T22:59:59.709Z

I am sure a query can be created for this

kgkaran@google.com 2022-12-19T23:00:26.751Z

yeah.. missed [REDACTED]. that should be easy

putze@google.com 2022-12-19T23:00:37.852Z

johanh@google.com 2022-12-19T23:02:05.559Z

like we chatted about earlier, it would be helpful to know who will be in that call/meeting, and if its set around specifically integration requirements for B*, or if Tjodolf S. will try to negotiate with Greg around which title/s

johanh@google.com 2022-12-19T23:02:25.261Z

maybe Karen/Brian can provide more details?

johanh@google.com 2022-12-19T23:02:41.558Z

I know Tjodolf a bit

kgkaran@google.com 2022-12-19T23:11:42.067Z

looking at the numbers again... if [REDACTED] doesn't come in... [REDACTED] and [REDACTED] may not be that bad as backups (they do [REDACTED] of [REDACTED])... though nothing like [REDACTED] 😬

johanh@google.com 2022-12-19T23:12:41.987Z

yeah they are by all means not small/insignificant titles. Especially [REDACTED]

johanh@google.com 2022-12-19T23:13:21.836Z

the main risk would be [REDACTED]

kgkaran@google.com 2022-12-19T23:13:36.949Z

I know... that is what prompted the 😬

putze@google.com 2022-12-19T23:14:35.269Z

greg crunched some numbers

putze@google.com 2022-12-19T23:14:48.942Z

[REDACTED]

putze@google.com 2022-12-19T23:14:55.138Z

[REDACTED]

putze@google.com 2022-12-19T23:15:52.877Z

so I think overall, with [REDACTED]

putze@google.com 2022-12-19T23:16:02.417Z

(still not [REDACTED] but not somethign to balk at)

putze@google.com 2022-12-19T23:16:25.072Z

After talking to Greg my sense is that he could live with and sell internally [REDACTED] [REDACTED] [REDACTED]

putze@google.com 2022-12-19T23:16:34.060Z

felt the [REDACTED] was a stronger signal to indsutry

But now i think the real lynchpin is [REDACTED]

kgkaran@google.com 2022-12-19T23:17:05.754Z

yeah... its the [REDACTED] but abk took multiple bets

putze@google.com 2022-12-19T23:17:14.554Z

Will they give us [REDACTED]

putze@google.com 2022-12-19T23:17:22.006Z

If not, greg will pass

putze@google.com 2022-12-19T23:17:25.717Z

if so, he'll take it

putze@google.com 2022-12-19T23:17:30.345Z

Thats my assessment

putze@google.com 2022-12-19T23:17:56.256Z

so johan, in prepping greg notes could come down to prepping him for [REDACTED] convo-- help him understand their pain points

putze@google.com 2022-12-19T23:18:56.088Z

he's thinking about framing it as a way to bootstrap their email identity

putze@google.com 2022-12-19T23:19:01.510Z

vs [REDACTED]

johanh@google.com 2022-12-19T23:20:41.608Z

ok, let me add to the [REDACTED] section

kgkaran@google.com 2022-12-19T23:22:08.234Z

I wish there were a way to think [REDACTED]
[REDACTED]
[REDACTED].. but that I am sure is a idealist's dream

putze@google.com 2022-12-19T23:22:31.744Z

ugh DREAM

kgkaran@google.com 2022-12-19T23:22:38.375Z

I know I know

putze@google.com 2022-12-19T23:22:38.658Z

I was like can it happen in background?

putze@google.com 2022-12-19T23:22:48.004Z

putze@google.com 2022-12-19T23:22:49.875Z

greg didnt really bite

putze@google.com 2022-12-19T23:23:21.417Z

im hoping in the convo tomorrow, we'd first [REDACTED]

johanh@google.com 2022-12-19T23:23:39.515Z

did the user login flows I put together for Greg last week help him?

putze@google.com 2022-12-19T23:23:47.035Z

yes thinks o

putze@google.com 2022-12-19T23:23:52.598Z

can you put those in doc as backup

putze@google.com 2022-12-19T23:23:55.102Z

as reminder

johanh@google.com 2022-12-19T23:23:56.547Z

let me add a link to that in the doc in case Tjodolf starts going into that

johanh@google.com 2022-12-19T23:23:58.203Z

yep

putze@google.com 2022-12-19T23:24:03.188Z

also johan can you send sameer email

putze@google.com 2022-12-19T23:24:08.968Z

im cranking on some other stuff

putze@google.com 2022-12-19T23:24:16.783Z

can you finalize the note and the data

johanh@google.com 2022-12-19T23:24:17.502Z

sure

putze@google.com 2022-12-19T23:24:32.622Z

like i couldnt remember [REDACTED]

kgkaran@google.com 2022-12-19T23:24:42.642Z

[REDACTED] I think

kgkaran@google.com 2022-12-19T23:25:17.932Z

kgkaran@google.com 2022-12-19T23:25:22.795Z

Can* make it

johanh@google.com 2022-12-19T23:27:12.606Z

ok, I can put [REDACTED], and where did we land in the end with the [REDACTED] Did they agree?

johanh@google.com 2022-12-19T23:27:33.457Z

or is it still mvoing?

johanh@google.com 2022-12-19T23:27:35.859Z

*moving

kgkaran@google.com 2022-12-19T23:27:43.279Z

It's 3 years now... Don't remember exact amount

johanh@google.com 2022-12-19T23:27:53.643Z

all good, I'll confirm

kgkaran@google.com 2022-12-19T23:28:31.109Z

[REDACTED]

johanh@google.com 2022-12-19T23:41:47.359Z

our term sheet says:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

johanh@google.com 2022-12-19T23:41:52.966Z

I believe thats the latest

johanh@google.com 2022-12-19T23:42:57.841Z

Im confirming with Brian now, he confirmed the [REDACTED]

[REDACTED]

johanh@google.com 2022-12-19T23:43:33.015Z

and for [REDACTED]

[REDACTED]

kgkaran@google.com 2022-12-19T23:45:07.522Z

[REDACTED] is defn wrong

kk

kgkaran@google.com 2022-12-19T23:45:27.222Z

In every deck ever I saw [REDACTED]... But then got updated to [REDACTED] because of [REDACTED]

johanh@google.com 2022-12-19T23:51:11.635Z

ah I see where the confusion is coming from

johanh@google.com 2022-12-19T23:51:21.314Z

BC doc:
https://docs.google.com/document/d/15KvbBhuRKMC52OXA9zNCFmiTK_22atm56iFPrcIgo-s/edit?resourcekey=0-NrpNsynuDJnXroVLeKR85w

https://drive.google.com/open?id=15KvbBhuRKMC52OXA9zNCFmiTK_22atm56iFPrcIgo-s
https://docs.google.com/document/d/15KvbBhuRKMC52OXA9zNCFmiTK_22atm56iFPrcIgo-s/edit?resourcekey=0-NrpNsynuDJnXroVLeKR85w

johanh@google.com 2022-12-19T23:51:55.574Z

Brian L is talking about the [REDACTED]

johanh@google.com 2022-12-19T23:51:59.595Z

and we are talking about the:

kgkaran@google.com 2022-12-19T23:52:00.082Z

That would be internal cost

johanh@google.com 2022-12-19T23:52:04.901Z

[REDACTED]

johanh@google.com 2022-12-19T23:52:35.520Z

ah, is that why we have it listed that way

kgkaran@google.com 2022-12-19T23:52:45.597Z

Though internal cost for [REDACTED] is close to [REDACTED]... So still don't get the [REDACTED]

johanh@google.com 2022-12-19T23:53:47.542Z

odd, but ok, to Sameer I'll write up to [REDACTED], and the [REDACTED] over 3 years

johanh@google.com 2022-12-19T23:54:31.454Z

by the time I hit send Armin will have pushed for [REDACTED]

kgkaran@google.com 2022-12-19T23:55:39.684Z

And by the time you lift your finger after hitting send, Karen would agree to it

putze@google.com 2022-12-19T23:59:09.030Z

haha

johanh@google.com 2022-12-19T23:59:53.927Z

also from the BC doc:

"[Updated Ask]

The deal has overall incremental revenue for Google of [REDACTED] and a positive contribution margin of [REDACTED]
Total value of incentives offered to ABK is [REDACTED]

johanh@google.com 2022-12-20T00:00:19.911Z

[REDACTED] we're moving forward with as of now?

kgkaran@google.com 2022-12-20T00:01:06.523Z

No clue... Divya asked the same but Andrey reverting

johanh@google.com 2022-12-20T00:01:42.363Z

ok Im confirming with Psol, I think we're currently at either [REDACTED]

johanh@google.com 2022-12-20T00:07:43.545Z

didnt hear back, but I'm 99.9% sure thats the margin we're moving forward with in the BC email approval request thats pending

kgkaran@google.com 2022-12-20T00:08:18.676Z

You could ping Andrew Lo. I think he's standing in for Andrey while he is ooo

johanh@google.com 2022-12-20T00:09:25.744Z

ah good pt, just pinged him as well, just to triple confirm, thx

johanh@google.com 2022-12-20T00:16:35.643Z

got confirm from Marcus & Brian, [REDACTED] and it has been approved unofficially

putze@google.com 2022-12-20T00:30:19.964Z

ok great

putze@google.com 2022-12-20T00:30:24.509Z

thanks-- you

putze@google.com 2022-12-20T00:30:30.870Z

you're updated draft LGTM

johanh@google.com 2022-12-20T22:38:01.920Z

I see we have a potential [REDACTED] in there for [REDACTED] do we expect this will fall off?

johanh@google.com 2022-12-20T22:38:07.637Z

[REDACTED]

now we are suddenly saying that [REDACTED], which would be great, but unlikely to fly

johanh@google.com 2022-12-20T22:40:56.564Z

tried to add a comment specifically in the doc

Updated on 2022-12-20T22:41:09.442Z

tried to add a comment specifically for that section in the doc

putze@google.com 2022-12-20T22:45:51.003Z

can you send to main chat

putze@google.com 2022-12-20T22:45:54.003Z

its a good point

johanh@google.com 2022-12-21T18:45:59.244Z

REDACTED - PRIVILEGE

putze@google.com 2022-12-21T18:49:31.077Z

REDACTED - PRIVILEGE

kgkaran@google.com 2022-12-21T18:49:52.131Z

+1 good catch

putze@google.com 2022-12-21T18:50:24.313Z

We will; make those f*ers pay the make good if its the last thing i do

putze@google.com 2022-12-21T18:59:30.910Z

omg

putze@google.com 2022-12-21T18:59:32.823Z

from karen

putze@google.com 2022-12-21T18:59:39.815Z

"In the meantime... From Eric:

" Spoke with Armin and he had a follow up with Bobby regarding the new B* proposal. The issue is that Bobby sees this as us agreeing to [REDACTED]

[REDACTED] I just don't see him agreeing to this unless I can show him some incremental value we are getting for agreeing to [REDACTED].

Is there a way we could adjust down the [REDACTED] It then allows me to go back to Bobby and say we are getting [REDACTED]

johanh@google.com 2022-12-21T19:00:38.830Z

interesting!

what is the discount for a janky version

johanh@google.com 2022-12-21T19:01:45.821Z

for [REDACTED] couldn't we ask for the [REDACTED]

kgkaran@google.com 2022-12-21T19:01:47.634Z

well, if we [REDACTED]
[REDACTED]

Updated on 2022-12-21T19:02:05.124Z

well, if we [REDACTED]
[REDACTED]

johanh@google.com 2022-12-21T19:04:10.021Z

if we [REDACTED] would remain intact right?

kgkaran@google.com 2022-12-21T19:05:33.795Z

no idea... the finance model is as transparent as a black painted brick

kgkaran@google.com 2022-12-21T19:44:34.333Z

@Emily Putze - good stuff pushing back on Arjun to figure out his shit (certification link)

putze@google.com 2022-12-21T19:47:35.935Z



kgkaran@google.com 2022-12-21T19:52:57.864Z

I am guessing the meeting in 8 minutes must be to discuss Bobby's response on [REDACTED]

putze@google.com 2022-12-21T19:53:57.305Z

yes did you see

putze@google.com 2022-12-21T19:54:02.682Z

"In the meantime... From Eric:

" Spoke with Armin and he had a follow up with Bobby regarding the new B* proposal. The issue is that Bobby sees this as us [REDACTED]

[REDACTED]. I just don't see him agreeing to this unless I can show him some incremental value we are getting for agreeing to [REDACTED]

Is there a way we could adjust down the [REDACTED] It then allows me to go back to Bobby and say we are getting "[REDACTED]"

kgkaran@google.com 2022-12-21T19:54:07.403Z

I did

kgkaran@google.com 2022-12-21T19:54:40.844Z

Karen needs to know that [REDACTED] (like I said above)... [REDACTED] is immaterial 😊

right

putze@google.com 2022-12-21T19:55:38.196Z

we need to bring that up

putze@google.com 2022-12-21T19:55:42.228Z

should we add divya

kgkaran@google.com 2022-12-21T19:55:50.330Z

I think so, adding

kgkaran@google.com 2022-12-21T19:56:04.934Z

added

johanh@google.com 2022-12-21T19:56:58.014Z

Karen didnt add me, but I think I'll still dial in

johanh@google.com 2022-12-21T19:57:01.957Z

let me know if any objections

kgkaran@google.com 2022-12-21T19:57:09.250Z

none at all

kgkaran@google.com 2022-12-21T19:57:15.400Z

adding you too (sorry didnt see)

johanh@google.com 2022-12-21T19:57:38.992Z

all good, thx, just want to be mindful if Karen wants to keep it small

johanh@google.com 2022-12-21T19:59:57.168Z

in my mind its worth considering [REDACTED]

[REDACTED] etc

johanh@google.com 2022-12-21T20:00:47.841Z

if its the [REDACTED] it seems like.. *drum roll* .. a stretch

putze@google.com 2022-12-21T20:04:30.071Z

'you guys have played around with this'

putze@google.com 2022-12-21T20:04:32.838Z

;))

johanh@google.com 2022-12-21T20:06:27.555Z

do we know if Eric's/Armin's note to Karen referred to the [REDACTED]

[REDACTED]
johanh@google.com 2022-12-21T20:10:40.166Z

nice save Emily 😊

putze@google.com 2022-12-21T20:11:06.802Z

like WHAT is greg saying

kgkaran@google.com 2022-12-21T20:11:13.214Z

!!

kgkaran@google.com 2022-12-21T20:13:09.115Z

[REDACTED]
kgkaran@google.com 2022-12-21T20:13:16.591Z

(to Greg's point on where does this stop)

kgkaran@google.com 2022-12-21T20:13:26.040Z

our response has to continue to be [REDACTED]

kgkaran@google.com 2022-12-21T20:18:07.930Z

that's not what he said yesterday?

kgkaran@google.com 2022-12-21T20:18:19.760Z

"I am not comfortable with [REDACTED]

putze@google.com 2022-12-21T20:20:16.627Z

he said [REDACTED]

putze@google.com 2022-12-21T20:20:35.176Z

And then they'd want to do the [REDACTED]

kgkaran@google.com 2022-12-21T20:27:48.811Z

should we offer to [REDACTED]
[REDACTED]

johanh@google.com 2022-12-21T20:30:32.585Z

in case you wondered, [REDACTED]

putze@google.com 2022-12-21T20:32:37.621Z

i agere

putze@google.com 2022-12-21T20:32:43.051Z

you mean karen / andrey versoin?

kgkaran@google.com 2022-12-21T20:33:03.314Z

kgkaran@google.com 2022-12-21T20:33:12.242Z

instead of [REDACTED]

kgkaran@google.com 2022-12-21T20:33:19.779Z

that gives them [REDACTED]

putze@google.com 2022-12-21T20:33:25.894Z

i mean we can

kgkaran@google.com 2022-12-21T20:33:29.949Z

i dont want to

putze@google.com 2022-12-21T20:33:31.412Z

does it hold the model

kgkaran@google.com 2022-12-21T20:34:25.171Z

I dont know... Andrey should tell if we want to even propose this... [REDACTED]... so I would hope it doesn't break the model apart

putze@google.com 2022-12-21T20:35:27.365Z

you dont want to

putze@google.com 2022-12-21T20:35:33.526Z

but you are open to it?

kgkaran@google.com 2022-12-21T20:36:35.662Z

for [REDACTED] I would be open... if our assumption that there is no reasonable way they can get to [REDACTED] is still the right assumption

kgkaran@google.com 2022-12-21T20:36:53.700Z

we're not really giving anything then... except on a trix

putze@google.com 2022-12-21T20:36:55.529Z

for [REDACTED] the shitty version

putze@google.com 2022-12-21T20:36:57.698Z

or big versino

kgkaran@google.com 2022-12-21T20:37:22.004Z

is the shitty version still a good public statement

kgkaran@google.com 2022-12-21T20:38:14.708Z

if not, then I'd only do for the optimized version

thre it is

kgkaran@google.com 2022-12-21T20:42:14.121Z

hmhhh

putze@google.com 2022-12-21T20:42:18.820Z

would you liek to chime in sir

putze@google.com 2022-12-21T20:42:20.069Z



kgkaran@google.com 2022-12-21T20:56:03.546Z

Emily Putze (_2022-12-21 12:42:18, UTC-08:00_):

'''

would you liek to chime in sir

'''

sorry for delaying the chime in 😊... wanted to make sure you guys are ok with it before I do... as IF this were to go ahead then we'll all need to fight finance etc together 😊

johanh@google.com 2022-12-21T20:56:12.256Z

oh no dont say "jelly" Greg, thats another Candy Crush game, Candy Crush Jelly Saga

putze@google.com 2022-12-21T20:56:14.375Z

for sure

kgkaran@google.com 2022-12-21T20:56:14.501Z

but yes, thank you for the push

kgkaran@google.com 2022-12-21T20:56:25.400Z



putze@google.com 2022-12-21T20:56:28.190Z

when karen says i dont want to say that yet

putze@google.com 2022-12-21T20:56:31.798Z

if i bring it up they'll want it

putze@google.com 2022-12-21T20:56:46.207Z

she needs to put two versions on the table

putze@google.com 2022-12-21T21:01:24.385Z

i disagree so strongly on this path

putze@google.com 2022-12-21T21:02:31.838Z

i think two deal options makes so much more sense at this point

Greg/Arjun have really come full circle on [REDACTED]

kgkaran@google.com 2022-12-21T21:05:54.452Z

in one day !!

putze@google.com 2022-12-21T21:06:36.912Z

like wtf

putze@google.com 2022-12-21T21:06:58.257Z

did they previously agree to [REDACTED]

johanh@google.com 2022-12-21T21:07:00.921Z

that is a good point by Greg, [REDACTED]

putze@google.com 2022-12-21T21:07:00.982Z

?

putze@google.com 2022-12-21T21:07:10.039Z

yeah i guess

kgkaran@google.com 2022-12-21T21:08:13.899Z

this [REDACTED] is just so full of crap !!

kgkaran@google.com 2022-12-21T21:08:25.304Z

I still cannot get over Christian and Steve agreeing to let it come into the deal model

putze@google.com 2022-12-21T21:09:10.795Z

wild

johanh@google.com 2022-12-21T21:10:34.544Z

```did they previously agree to [REDACTED]

there is no mention of [REDACTED] in ABK GVP 1.0, and the only section in MOU that has it our new 2.c. B\* section we crafted yesterday

Updated on2022-12-21T21:10:58.480Z

```did they previously agree to [REDACTED]

there is no mention of [REDACTED] in ABK GVP 1.0, and the only section in GVP 2.0 MOU that has it is our new 2.c. B* section we crafted yesterday

kgkaran@google.com 2022-12-21T21:11:03.022Z

they have never agreed to it in any past deal

johanh@google.com 2022-12-21T21:16:25.019Z

they are not going to care if its less titles to Chromebook I think, its Armin/Bobby response was that they need license money for ABK Brand/IP on your platforms

johan.h@google.com 2022-12-21T21:16:56.337Z

so for [REDACTED] they would still ask for [REDACTED]

johan.h@google.com 2022-12-21T21:17:13.864Z

Bobby K is hardcore about [REDACTED]

johan.h@google.com 2022-12-21T21:19:09.385Z

how did we do it for [REDACTED] without asking ABK/partners, would'nt we do the same for B*? It's somehow covered in our Developer Agreement?

putze@google.com 2022-12-21T21:19:15.554Z

what is wrong with 2 deal scenario

putze@google.com 2022-12-21T21:19:28.779Z

karan

putze@google.com 2022-12-21T21:19:31.082Z

am i crazy

putze@google.com 2022-12-21T21:19:40.810Z

do you disagree

kgkaran@google.com 2022-12-21T21:19:50.960Z

not at all. 2 deal scenarios is the right way to go... not sure why she is going down other paths

putze@google.com 2022-12-21T21:20:05.256Z

shall i say it again?

putze@google.com 2022-12-21T21:20:12.752Z

i feel like ive said it 3 times

johan.h@google.com 2022-12-21T21:28:03.663Z

we're about to hit the 1.5hr mark, should we get our POV/suggestions in a doc to Karen?

johan.h@google.com 2022-12-21T21:31:42.486Z

nitpick: they may also be considering [REDACTED]

putze@google.com 2022-12-21T21:33:58.077Z

my pov is two options, share those on the call, greg tell him how easy

johan.h@google.com 2022-12-21T21:36:53.205Z

helping meet their targets sounds good, [REDACTED]

putze@google.com 2022-12-21T21:41:48.517Z

<https://docs.google.com/document/d/1wzvdiORvURLRLic6OcWINRpnHSHiCcmd3yPMNNIclFc/edit?resourcekey=0-cBHI2-dznBGE-Y7fkXEsMg>

<https://drive.google.com/open?id=1wzvdiORvURLRLic6OcWINRpnHSHiCcmd3yPMNNIclFc>

<https://docs.google.com/document/d/1wzvdiORvURLRLic6OcWINRpnHSHiCcmd3yPMNNIclFc/edit?resourcekey=0-cBHI2-dznBGE-Y7fkXEsMg>

kgkaran@google.com 2022-12-21T21:56:09.591Z

lgtm

putze@google.com 2022-12-21T21:56:21.678Z

same -- thanks for your help polishing so fast

putze@google.com 2022-12-21T21:56:31.966Z

My gut strongly tells me this is best

putze@google.com 2022-12-21T21:56:35.578Z

lets stop trying to influence

putze@google.com 2022-12-21T21:56:38.882Z

put money on the table

putze@google.com 2022-12-21T21:56:42.144Z

let them choose

kgkaran@google.com 2022-12-21T21:56:56.569Z

this should be the last few minutes we spend on this deal

putze@google.com 2022-12-21T21:57:01.786Z

i totally agree

kgkaran@google.com 2022-12-21T21:57:08.151Z

we've done what we could

kgkaran@google.com 2022-12-21T21:57:11.165Z

adjusted what we could

putze@google.com 2022-12-21T21:57:42.889Z

we've done a lot

putze@google.com 2022-12-21T21:57:56.999Z

the three of us have made this deal much less worse for Play

kgkaran@google.com 2022-12-21T21:58:12.807Z

putze@google.com 2022-12-21T21:58:19.555Z

[REDACTED]

putze@google.com 2022-12-21T21:58:25.864Z

keeping b* in this long

putze@google.com 2022-12-21T21:58:31.831Z

we started from teh bottom

putze@google.com 2022-12-21T21:58:38.736Z

we're still under water

kgkaran@google.com 2022-12-21T21:58:45.096Z

Yes, no guilt trips now

putze@google.com 2022-12-21T21:58:50.974Z

but, we'll live!

putze@google.com 2022-12-21T21:59:08.800Z

i know its bad but when divvya wants me to fill her in on the bad outcomes (i.e. why not [REDACTED]) im like MOVE ON

putze@google.com 2022-12-21T21:59:09.793Z

haha

putze@google.com 2022-12-21T21:59:12.711Z

i have no time for it anymore

putze@google.com 2022-12-21T21:59:20.447Z

(even though its a totally reasonable question)

johanb@google.com 2022-12-21T22:00:03.064Z

she pinged me separately on that too, so I spent some time on explaining to her everything we've tried etc

putze@google.com 2022-12-21T22:00:08.009Z

<https://media.tenor.com/SuHZPLW71ggAAAAM/sid-wack-a-mole.gif>

putze@google.com 2022-12-21T22:00:24.269Z

i cant spend time doing that because im doing this

putze@google.com 2022-12-21T22:00:25.665Z

hahaha

putze@google.com 2022-12-21T22:00:28.511Z

thanks johan

she deserves the answer

putze@google.com 2022-12-21T22:00:37.811Z

i just dont have brain space

putze@google.com 2022-12-21T22:00:46.002Z

(so thank you for covering)

johanh@google.com 2022-12-21T22:01:14.806Z

I think it's easy to sit on the outside and get the wrong impression, tbh, Arjun/Greg we're definitely in this camp for a while too until they got painfully clear on all the details

johanh@google.com 2022-12-21T22:01:45.899Z

of course! whatever I can do to help/offlift

putze@google.com 2022-12-21T22:02:22.620Z

totally

kgkaran@google.com 2022-12-21T22:02:43.563Z

Divya is bad at communicating her good intent... She asks her questions in an interrogating way... Even though she's asking so she can help hold off Christian etc

johanh@google.com 2022-12-21T22:02:48.422Z

impressive turn around on the 2 path write up, mustve set some sort of record there. It looks great to me, just wondered [REDACTED], but I may have missed this in one of the last turns

johanh@google.com 2022-12-21T22:03:17.774Z

that makes sense re:Divya

kgkaran@google.com 2022-12-21T22:03:22.584Z

I think it's fine to tell ABK this is all we care about... [REDACTED]

kgkaran@google.com 2022-12-21T22:03:28.008Z

WDYT

johanh@google.com 2022-12-21T22:04:39.262Z

[REDACTED]
[REDACTED]

johanh@google.com 2022-12-21T22:05:07.288Z

[REDACTED]

johanh@google.com 2022-12-21T22:08:44.560Z

I know Tjodolf (King CEO) and [REDACTED] let me know if there is anything you want me to try to ask them. I've refrained so far to not complicate/confuse anything

Do we want Greg to ping Sameer with a high level thoughts process before Don calls him?

kgkaran@google.com 2022-12-21T22:19:40.931Z

I still worry Sameer will tell Don to go ahead and ignore B*

johanh@google.com 2022-12-21T22:27:53.671Z

yeah it's probably good if he gets the full picture from Greg, between Don & Sameer many details/nuances could go missing

putze@google.com 2022-12-21T23:10:23.224Z

can someone look up for me

putze@google.com 2022-12-21T23:10:25.673Z

how much did [REDACTED] make in 2022

johanh@google.com 2022-12-21T23:10:51.870Z

yah pulling

kgkaran@google.com 2022-12-21T23:11:13.172Z

I think I saw [REDACTED] in last 13 months

kgkaran@google.com 2022-12-21T23:11:15.947Z

12*

johanh@google.com 2022-12-21T23:11:23.706Z

[REDACTED] 2022 YTD

kgkaran@google.com 2022-12-21T23:11:59.069Z

Eek that's it then :)

johanh@google.com 2022-12-21T23:12:37.249Z

Screen Shot 2022-12-21 at 8.12.06 PM.png

johanh@google.com 2022-12-21T23:16:49.888Z

[REDACTED] isn't that far off from [REDACTED] 2022 YTD Spend, [REDACTED]

johanh@google.com 2022-12-21T23:55:41.320Z

lgtm

kgkaran@google.com 2022-12-21T23:56:43.496Z

Arjun is re-writing what I wrote in 3 words to a something that is 3 sentences long

kgkaran@google.com 2022-12-21T23:56:54.436Z

what is with the product guys are total ignorance of brevity

yeah I see him typing up a storm haha

kgkaran@google.com 2022-12-22T00:05:37.081Z

ok I can argue this... and totally push back, but I said earlier to Emily that we should be spending our last few mins on this deal, so I won't

kgkaran@google.com 2022-12-22T00:05:47.785Z

not worth wasting so much time on how to write 1 sentence

johanh@google.com 2022-12-22T00:06:06.409Z

true that, not hill worth fighting

johanh@google.com 2022-12-22T00:06:16.288Z

and also, Arjun can be quite persistent

kgkaran@google.com 2022-12-22T00:06:38.841Z

Purnima's training for 4 years of total brevity is strong in my head... so there was a strong urge to just cut cut cut more

putze@google.com 2022-12-22T00:06:50.747Z

SAME

johanh@google.com 2022-12-22T00:07:06.181Z

strong urge to cute Armin over here

Updated on2022-12-22T00:07:20.745Z

strong urge to cut Armin over here

kgkaran@google.com 2022-12-22T00:08:37.937Z

Johan Heurlin (_2022-12-21 16:06:16, UTC-08:00_):

...

and also, Arjun can be quite persistent

...

well, that again is something I could have fought... historically Karan and Arjun are characters that are enemies to death 😊
... its in the Mahabharata (the Iliad / Odyssey of India)

kgkaran@google.com 2022-12-22T00:08:43.145Z

him and I are born to fight 😊

kgkaran@google.com 2022-12-22T00:08:44.385Z

https://en.wikipedia.org/wiki/Karna_Parva

https://en.wikipedia.org/wiki/Karna_Parva

kgkaran@google.com 2022-12-22T00:08:51.646Z

Karan gets killed though 😊

kgkaran@google.com 2022-12-22T00:09:36.579Z

johanh@google.com 2022-12-22T00:09:39.062Z

time to rewrite history!

kgkaran@google.com 2022-12-22T00:09:55.890Z

haha

putze@google.com 2022-12-22T00:10:07.833Z

should we add a ABK POV

putze@google.com 2022-12-22T00:10:29.425Z

like ABK POV-- [REDACTED] and they want [REDACTED]

kgkaran@google.com 2022-12-22T00:21:04.621Z

oh man... the doc is a massacre-ground now... I destroyed what Emily wrote, Arjun destroyed mine, and now Greg is destroying Arjun's

johanh@google.com 2022-12-22T00:21:18.737Z

haha

johanh@google.com 2022-12-22T00:21:25.361Z

you want me to give it a go ;)

kgkaran@google.com 2022-12-22T00:21:41.608Z

haha... why not... there's enough for everyone 😊

Exhibit A21

Public Redacted Version

EXHIBIT 30

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Page 1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-----x
IN RE GOOGLE PLAY STORE Case No.
ANTITRUST LITIGATION 3:21-md-02981-JD

THIS DOCUMENT RELATES TO:

Epic Games Inc. v. Google LLC, et al.,
Case No. 3:20-cv-05671-JD

In re Google Play Consumer Antitrust
Litigation, Case No. 3:20-cv-05761-JD

State of Utah, et al. v. Google LLC et al.,
Case No. 3:21-cv-05227-JD

Match Group LLC, et al. V. Google LLC et al.,
Case No. 3:22-cv-02746-JD

-----x
** HIGHLY CONFIDENTIAL - UNDER PROTECTIVE ORDER **

REMOTE VIDEOTAPED DEPOSITION OF
SUNDAR PICHAI
Monday, February 27, 2023

REPORTED BY:

RENEE HARRIS, CA CSR 14168, NJ CCR, RPR

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Page 11

1 Will the court reporter please swear in
2 the witness, and then counsel may proceed.

3
4 SUNDAY PICHAI,
5 called as a witness and having been first duly
6 sworn by the Certified Shorthand Reporter, was
7 examined and testified as follows:

8
9 EXAMINATION

10 BY MS. MOSKOWITZ:

11 Q. Good morning, Mr. Pichai. My name is
12 Lauren Moskowitz. I'll be beginning the
13 questioning. I represent Epic Games.

14 A. Thank you, good morning.

15 Q. If you could please state your full name
16 for the record to begin.

17 A. Sundar Pichai.

18 Q. And where are you currently located right
19 now?

20 A. I'm located in Palo Alto, California.

21 Q. The Google offices?

22 A. That's right.

23 Q. And who is in the room with you right
24 now?

25 A. I have Lara and Glenn, our counsel,

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Page 28

1 what the revenue share is to Apple?

2 A. You know, I don't know the specific
3 amounts, but, you know, I have a general trend of
4 the direction of the amounts, yes.

5 Q. And is the general direction [REDACTED]

6 [REDACTED]

7 A. Yes, it is.

8 Q. Is that [REDACTED]

9 A. That's correct.

10 Q. And it was, in fact, [REDACTED]

11 last year; correct?

12 A. I don't know the specific amount, but
13 that sounds about right.

14 (Exhibit 2721 was received and marked
15 for identification on this date and is
16 attached hereto.)

17 BY MS. MOSKOWITZ:

18 Q. Okay. We're going to mark another
19 document. It's going to be Exhibit 2721. It will
20 take a moment to load. We'll let you know when
21 it's there.

22 Okay. It should be up. Let me know when
23 you have it open, please.

24 A. So what is the name of the exhibit?

25 Q. It should be Exhibit 2721.

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Page 39

1 A. I'm not sure how it's in the most recent
2 versions of MADA. We have various versions. But
3 typically, yes.

4 Q. And do you understand that the version in
5 place today, if someone was signing a MADA today,
6 would require Google Play to be located on the
7 default home screen? Correct?

8 A. That's my understanding, yes.

9 Q. And by requiring only OEMs to place
10 Google Play on the default home screen, Google is
11 increasing the use of Google Play over other app
12 stores; correct?

13 A. The intent we have, what we are doing is
14 that we want to make sure, you know, we are
15 competing, in many cases, primarily, with Apple's
16 iOS and iPhones.

17 And people have strong expectations, and
18 so we are trying to -- one of the most important
19 use cases for people when they get a phone is to
20 look for other applications.

21 And we are trying to provide a consistent
22 experience. And so as part of that, we view it as
23 an important out-of-the-box experience. So that's
24 what we are trying to accomplish.

25 Q. Well, that -- that refers to needing an

HIGHLY CONFIDENTIAL

Page 44

1 have shipped Android smartphones without
2 necessarily using MADA. I think Amazon continues
3 to ship, you know, versions of their tablets now
4 without necessarily Mobile Application
5 Distribution Agreements.

6 But in general, yeah, I agree with what
7 you said.

8 Q. And Amazon's Android is a fourth Android
9 syst- -- OES -- sorry -- OS?

10 A. I think it's fine to think -- there's no
11 clear definition of what a fourth Android is, but,
12 yeah, they use Android open source and -- and
13 modify it.

14 Q. And so you're referring to Android as a
15 tablet. Just focusing on just smartphones, Google
16 Play is preinstalled on the default home screen of
17 nearly all Android smartphones; correct?

18 A. That's correct.

19 Q. And Google Play is the only app store
20 that is preinstalled on nearly all Android
21 smartphones; correct?

22 A. Now, I'm not sure. I think almost all
23 Samsung phones I've seen have the Galaxy Store
24 preinstalled as well, typically. So typically
25 when I see, there are secondary app stores, too.

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Page 185

1 subjective phrase. It's in the eyes of the
2 beholder to some extent.

3 And so, you know, it's difficult for me
4 to abstractly answer that. Particularly since you
5 are asking it in connection with a legal
6 framework.

7 So, you know, but the way we approach our
8 work, we strive to make sure we provide balanced
9 and high-quality information, putting user
10 experience first.

11 Q. Does Google always provide accurate
12 representations to users about other products that
13 users might seek to obtain?

14 MR. POMERANTZ: Objection to the form.

15 THE WITNESS: It's a very broad question.
16 Can you narrow it down? Like, we operate in
17 many, many different businesses.

18 But the spirit of what you're asking,
19 yes.

20 BY MS. GIULIANELLI:

21 Q. Okay. Now, moving on to a different
22 topic.

23 Do you ever use Google Chat for business
24 purposes?

25 A. Yes, I do.